

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In Re:	:	Bankruptcy No. 25-10068 (CTG)
JOANN INC., <i>et al.</i>	:	
	:	
Debtor	:	
	:	Chapter 11
JOANN INC., <i>et al.</i>	:	
	:	
Movant	:	
	:	Related to Document No.
v.	:	
	:	
No Respondent	:	

**NOTICE OF APPEARANCE AND REQUEST FOR NOTICE**

PLEASE TAKE NOTICE that Joseph B. Spero, Esquire, hereby appears as counsel for Summit Towne Centre and pursuant to Fed. R. Bankr. P. 2002 and 9010, requests that all notices given or required to be given in the above case be given to and served upon:

JOSEPH B. SPERO, ESQUIRE  
SPERO LAW OFFICE  
3213 West 26<sup>th</sup> Street, Erie, Pennsylvania 16506  
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PLEASE TAKE FURTHER NOTICE that the foregoing request includes not only notices and papers referred to in the Rules specified above, but also includes, without limitation, all orders and notices, applications, motions, petitions, pleadings, requests, complaints, demands, replies, answers and any other papers, whether formal or informal, whether written or oral, and whether transmitted by mail, hand delivery, telephone, facsimile, email or otherwise, that affects any party in interest, creditor, the Debtor, Debtor-in-Possession, or property of the Debtor or Debtor-in-Possession.

This Notice of Appearance and Request for Notice shall not be deemed or construed to be a waiver of Summit Towne Centre's right (1) to have final orders in non-core matters entered only after *de novo* review by a District Court, (2) to trial by jury in any proceeding so triable in these cases or any case, controversy or proceeding related to these cases, (3) to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (4) to any other rights, claims, actions, defenses, setoffs, or recoupments to Summit Towne Centre, is or may be entitled, in law or in equity: all of which rights, claims, actions, defenses, setoffs and recoupments to which Summit Towne Centre, expressly reserves.

Date: June 20, 2025

Respectfully submitted,

By /s/ Joseph B. Spero, Esquire  
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